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Attorneys for Plaintiff

VICTOR M. RIOS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE: ZOOM VIDEO
COMMUNICATIONS, INC.
PRIVACY LITIGATION,

Master File No: 5:20-CV-02155-LHK

This Document Relates to:

Application For Appointment Of The
Wolfson-Molumphy Team As Interim
Co-Lead Counsel And Plaintiffs'
Steering Committee

RESPONSE TO APPLICATIONS FOR
APPOINTMENT AS INTERIM CLASS
COUNSEL – PLAINTIFF RIOS
SUPPORTS THE APPLICATION FOR
APPOINTMENT BY THE WOLFSON-
MOLUMPHY TEAM AS INTERIM CO-
LEAD COUNSEL AND PLAINTIFFS'
STEERING COMMITTEE

Plaintiff Victor M. Rios (“RIOS”), individually and on behalf of himself and all others similarly situated, hereby supports the appointment of the Wolfson-Molumphy Team as interim co-lead counsel and plaintiffs’ steering committee.

The applications for appointment clearly show many very qualified attorneys

RESPONSE TO APPLICATIONS FOR APPOINTMENT AS INTERIM CLASS COUNSEL – PLAINTIFF RIOS
SUPPORTS THE APPLICATION FOR APPOINTMENT BY THE WOLFSON-MOLUMPHY TEAM AS INTERIM CO-
LEAD COUNSEL AND PLAINTIFFS’ STEERING COMMITTEE

1 applying for this appointment and plaintiff RIOS believes that all of them could perform
 2 more than adequately as interim counsel. However, the application for appointment of the
 3 Wolfson-Molumphy team stands out amongst the applications as the one group of attorneys
 4 that would undoubtedly perform an exemplary service to the various class representatives
 5 and the class members across the board. They consist of four (4) law firms that have the
 6 skill, time, and resources to prosecute what will undoubtedly be a very difficult case against
 7 a corporation that has now become as much of the world's culture as Microsoft's Windows
 8 and Apple's iPhones. The defendant imposed a boilerplate adhesionary contract on its
 9 subscribers/users that contains the standard clauses to unlevel the playing field, e.g.,
 10 mandatory arbitration, prohibition on class actions, and liquidated damages. It will be an
 11 uphill battle given the decisions of the Supreme Court of the United States on these kinds
 12 of issues, but the Wolfson-Molumphy team is capable of pursuing every possible avenue of
 13 recovery on behalf of the class members. Plaintiff RIOS is confident that they will
 14 vigorously advocate for a just recovery for those harmed by the "Zoombombers" and also
 15 pursue the remedies available for the violation of the privacy rights of the class members.
 16 The team is indeed diverse in gender, racial/ethnic identity, national origin, age, and life
 17 experience in compliance with the guidance provided by the Duke Law Center for Judicial
 18 Studies, *Standards and Best Practices for Large and Mass-Tort MDLs*, Best Practice 4E.

19 Based on the foregoing, plaintiff RIOS respectfully supports and recommends the
 20 appointment of the Wolfson-Molumphy team as interim co-lead counsel and to the
 21 plaintiffs' steering committee.

22 DATED: June 12, 2020

Respectfully submitted,

LAW OFFICES OF JOHN L. FALLAT

BY: JOHN L. FALLAT

JOHN L. FALLAT

Counsel for Plaintiff VICTOR M. RIOS

PROOF OF ELECTRONIC SERVICE

I declare that:

I am employed in Marin County, California.

I am over the age of eighteen years and not a party to the within action or cause; that my business address and place of employment is Law Offices of John L. Fallat, 68 Mitchell Boulevard, Suite 135, San Rafael, CA 94903-2046. I served the attached document entitled "*RESPONSE TO APPLICATIONS FOR APPOINTMENT AS INTERIM CLASS COUNSEL-PLAINTIFF RIOS SUPPORTS THE APPLICATION FOR APPOINTMENT BY THE WOLFSON-MOLUMPY TEAM AS INTERIM CO-LEAD COUNSEL AND PLAINTIFFS' STEERING COMMITTEE*" on the interested parties in said cause:

☐ BY MAIL: I placed a copy of said document in a sealed envelope with postage fully prepaid thereon in the United States mail at Burlingame, California on June 12, 2020

☐ BY PERSONAL SERVICE: I caused a copy of said document to be placed in a sealed envelope to be delivered by hand to the office(s) of the addressee(s) on the date below.

☐ BY FEDERAL EXPRESS: I caused a copy of said document to be placed in a sealed envelope to be delivered to Federal Express for overnight courier service to the Office(s) of the addressee(s) on the date below.

☐ BY FACSIMILE: I caused a copy of said document to be sent via FACSIMILE to the addressee(s), as above, on June 12, 2020

☒ BY ELECTRONIC TRANSMISSION: I caused all of the above-entitled documents to be served through the United States District Court, Northern District of California electronic service list by selecting the individual recipients on the court's website on the date executed below. The file transmission was reported as complete and a copy of the filing receipt page will be maintained with the original documents in our office.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 12, 2020 at San Rafael, California.

/s/ ROXANNE CULLEN

ROXANNE CULLEN

RESPONSE TO APPLICATIONS FOR APPOINTMENT AS INTERIM CLASS COUNSEL – PLAINTIFF RIOS
SUPPORTS THE APPLICATION FOR APPOINTMENT BY THE WOLFSON-MOLUMPY TEAM AS INTERIM CO-
LEAD COUNSEL AND PLAINTIFFS' STEERING COMMITTEE